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5
6 Attorneys for Defendant,
MANUEL CORONA CONTRERAS

7
8 IN THE UNITED STATES DISTRICT COURT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,) No. CR-08-0083 PJH
11 Plaintiff,) ORDER PERMITTING
12) DEFENDANTS TO USE MP3
13) AUDIO PLAYERS TO REVIEW
14 vs.) DISCOVERY AT GLENN
15) DYER JAIL [Proposed]
16 GUILLERMO ALEJANDRO ZARAGOZA, et al.,)
17 Defendants.)
18 _____)

19 TO: ALAMEDA COUNTY SHERIFF'S DEPARTMENT, GLENN DYER

20 FACILITY:

21 YOU ARE HEREBY DIRECTED to permit the following defendants to use an approved
22 MP3 player in order to review audio discovery at Glenn Dyer Jail:

23 ZARAGOZA, GUILLERMO ALEJANDRO
24 CONTRERAS, MANUEL CORONA
25 QUEZADA, DAVID BEJINEZ
26 VALENCIA, MARTEL MURILLO
27 ZARAGOZA, EDUARDO
28 ZARAGOZA, MARTIN ESTRADA

29 ORDER RE: JAIL MP3 PLAYERS
(CR-08-083 PJH)

1 Each defendant who requests an MP3 player will be permitted to have his own device.
2 At least two of the defendants, GILLERMO ALEJANDRO ZARAGOZA and MARTIN
3 ZARAGOZA, will require two MP3 players because of the volume of audio discovery pertaining
4 to them.

5 The MP3 players will be delivered to Inmate Services or to individual defendants by their
6 counsel, as directed by the facility's administration.

7 IT IS SO ORDERED.

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9 Dated: _____, 2008

10 HONORABLE PHYLLIS J. HAMILTON
11 United States District Judge

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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,) No. CR-08-0083 PJH
11 Plaintiff,)
12) JOINT APPLICATION FOR
13) ORDERING PERMITTING
14) INCARCERATED DEFENDANTS'
15) USE OF MP3 TO REVIEW
16) AUDIO DISCOVERY AT GLENN
vs.) DYER JAIL
GUILLERMO ALEJANDRO ZARAGOZA, et al.,)
Defendants.)

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Defendant Manuel Corona Contreras, on behalf of all defendants detailed at the Glenn Dyer Jail, Oakland, California, moves the Court for an Order directing the Jail Administration to permit defendants' possession and use of MP3 players for the purpose of reviewing audio discovery in this case.

The indictment charges a large methamphetamine distribution conspiracy that is the culmination of an over two-year FBI investigation. The investigation involved six separate periods of electronic surveillance on multiple lines, as well as the execution of search warrants at eleven separate locations. The government has designated more than 3,800 calls as pertinent to the investigation. All or nearly all these calls are in the Spanish language. Consequently, to a greater degree than in most wiretap cases, defense counsel are dependant on their clients for a

1 completely and contextually accurate translation and explanation of the calls, as well as the
2 identification of the significant number of persons identified only as UM, Unidentified Male, and
3 UF, Unidentified Female, in the discovery. These are potential witnesses for the defense both in
4 the preparation of the wiretap suppression motion and of the defense for trial.

5 It would be impractical, needlessly time-consuming and unduly costly for defense
6 counsel to be present while their clients reviewed the large volume of telephone calls that form
7 the basis for this prosecution. Conversely, it would be far more efficient and cost-effective for
8 defendants to review their relevant calls before conferring with counsel. This procedure has
9 been followed in large wiretap cases since the government began recording digitally.

10 Defense counsel are familiar with the specifications of the MP3 player allowed in the jail
11 and will follow all directions of the jail administration in providing the players containing the
12 pertinent audio recordings to their clients.

13 For these reasons, the Court is respectfully urged to authorize the use of MP3 players by
14 the incarcerated defendants.

15 Dated: 4/25/08

16 Respectfully submitted,

17 _____
18 /s/ Nina Wilder
19 NINA WILDER
20 Attorney for Defendant
21 Manuel Corona Contreras
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